

W-407

TREATMENT AND STORAGE FACILITY INSPECTION FORM
HAZARDOUS WASTE MANAGEMENT PROGRAM
WISCONSIN DEPARTMENT OF NATURAL RESOURCES

Note: A separate inspection form must be completed for each treatment and storage facility, even if more than one facility is owned by the same person or company unless the facilities are located on one contiguous parcel of land.

I. GENERAL INFORMATION

DEPARTMENT INFORMATION

DNR District: South Central

Inspection date: 5/8/98

DNR Inspectors(s) Walt Francis, U.S. EPA

Linda Hanefeld, WDNR

FACILITY INFORMATION EPA ID: WID 000 809 012

FID: _____

Corporate/Facility Name: University of Wisconsin - Madison

Facility Location:

Street: 115 North Mills Street

City: Madison

County: Dane

Zip: 53715

Site Personnel Present:

Pete Reinhardt

Title: Asst. Dir.

CHemist +

Env. Safety

Dennis Silbaugh

CHemist +

Reg. Supervisor

Facility Mailing Address:

Street or P.O. Box: 103 North Lake Street

City: Madison

State: WI

Zip: 53715-1272

Phone: (608) 262-9735

Operator: University of Wisconsin

Title: _____

Phone: _____

Legal Owner: Board of Regents - University of Wisconsin

Street: Bascom Hall

City: Madison

State: WI

Zip: 53715

Phone: _____

Company Product/Main Process: Major State owned and operated University.

II. NOTIFICATION

- A. Has the facility submitted a notification form to the U.S. EPA with a copy to the Department and obtained an identification number? NR 630.11

Yes ☒ No ☐

Comments _____

III. WASTE GENERATED ON-SITE

Note: If waste is generated on-site, complete this section. If not, go to section IV, pg. 6.

A. SUMMARY TABLE

Waste Type	Generation Rate/Month#	Hazardous Waste Code	LDR Status+	Exceeds Treatment Standards Yes/No	Waste Handling*
1) Ignitable waste		D001		yes	
2) Corrosive waste		D002			
3) Heavy Metals		D006/D009			
4) Mercury		D003 D009			
5) Arsenic		D004			
6) State of California ^{Carbon} Disposal F-005					
7) Pentachlorophenol		F027			
8) Cadmium		D006			

Attach waste profile, analysis, MSDS's, or other information to indicate how the facility has complied with NR 615.06, Hazardous Waste Determination, for each waste stream.

+LDR Status - use the following codes:

- | | |
|--|---------------------------|
| 1. F001-F005 Solvents (NR 675.11) | 4. First 3rd (NR 675.14) |
| 2. F020-F023, F026-F028, Dioxins (NR 675.12) | 5. Second 3rd (NR 675.15) |
| 3. California list (NR 675.13) | 6. Third 3rd (NR 675.16) |

*Waste handling - Indicate if the waste is handled on-site or provide name of off-site facility.

B. WASTE STREAM INFORMATION: NR 630.12

1. Waste Determination NR 605.12, NR 615.06, NR 630.12, NR 675

- a. Have all wastes been correctly identified, and if necessary tested, to obtain enough information to treat, store or dispose of the waste properly?

☒ Yes No

If no, list those not identified correctly below:

Note: The inspector should determine if the generator has made a hazardous waste determination on all solid waste generated, including compliance with the TCLP requirements.

<u>Waste Type</u>	<u>Assigned Classification</u>	<u>Correct Classification</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

- b. Have waste samples been analyzed by a laboratory certified or registered under Chapter NR 149, Wis. Adm. Code for all analysis performed that are not exempted from this requirement? NR 605.12(1)

☒ Yes No

- c. Have both the listed and characteristic waste code been assigned where a listed waste exhibits a characteristic? NR 675.09

☒ Yes No NA

Comments _____

- d. Has multi-source leachate been assigned the F039 waste code?* NR 605.09(2)

Yes No ☒ NA

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate?

Yes No ☒ NA

- e. Has the waste analysis been repeated if the process or operation generating the hazardous waste has changed? NR 630.12(3)

☒ Yes No

Comments _____

2. Treatability Group/Treatment Standard Identification

- a. F001-F005 Spent Solvent Wastes; F020-F023 and F026-F028 Dioxin Wastes; First, Second, and Third 3rd Wastes:

- 1) Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

☒ Yes No NA

If available, list each waste code and check correct treatability group.

<u>Waste Code</u>	<u>Subcategory</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
<u>D 001</u>	<u>F002, F013</u>	<u></u>	<u>X</u>
<u></u>	<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>	<u></u>
<u></u>	<u></u>	<u></u>	<u></u>

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight.

- 2) Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? NR 675.09(2)
- 3) Are alternative treatment standards specified for lab packs?

☒ Yes No NA

☒ Yes No NA

If yes, do lab packs only contain the following wastes? NR 675.22(4)(b)

- ☒ Organometallics: NR 675, Appendix III constituents
- ☒ Organics: NR 675, Appendix IV constituents

- 4) Are alternative treatment standards specified for F039 multi-source leachate?

Yes No ☒ NA

- b. California List Wastes: Have the correct treatability group and treatment standard/prohibition level been determined for the following wastes? NR 675.20-24

- 1) Liquid hazardous wastes containing PCBs - ≥ 50 ppm

Yes No ☒ NA

If yes, check the appropriate treatability group:

 50 to 500 ppm PCBs ≥ 500 ppm PCBs

- 2) Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content.

Yes No ☒ NA

If yes, check the appropriate treatability group:

 Dilute HOC wastewater (1,000 mg/l to 10,000mg/l HOCs)

 All other HOC's greater than or equal to the prohibition level of 1,000 mg/l (liquids or mg/kg (non-liquids))

3) Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium. Yes No ☒ NA

c. Treatment standards expressed as required technologies: Yes No ☒ NA
Has an alternative method been specified to that required in NR 675.22?

If yes, list the waste code, the technology specified in NR 675.22, the alternative method, and documentation of approval. NR 675.22(2)

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

d. Are restricted wastes with different treatment standards for a constituent of concern mixed? ☒ Yes No

If yes, were the most stringent treatment standards selected? NR 675.21(2) and NR 675.23(2) ☒ Yes No NA

Comments _____

C. WASTE MINIMIZATION

Section NR 615.08(8)(k) requires the generator to certify on the hazardous waste manifest that he/she has a program in place to reduce the volume and toxicity of waste generated to the degree economically practicable.

1. Does the generator have a waste minimization/pollution prevention plan? ☒ Yes No

If yes, can the generator document that the plan is being implemented? ☒ Yes No NA

If no, can the generator document that a waste minimization program exists? Yes No NA

2. Look for visual evidence that there is a waste minimization program in place. Make appropriate suggestions for their consideration and provide them with Department literature and information sources.

Comments LAB chemicals collected from various Research labs
that are no longer used are collected and stored up to 2 yrs
(parent condition). These chemicals then may be transferred to
OTHER labs requesting them.

IV. WASTE RECEIVED FROM OFF-SITE

Note: If waste is received from off-site complete this section. If not, proceed to section V.

A. SUMMARY TABLE

Waste Type	Amount Rc'd/Month#	Hazardous Waste Code	LDR Status+	Exceeds Treatment Standards Yes/No	Waste Handling*
1) Spent LAB solvents		0001	6	Yes	
2) Non-Solvents		LAB ACIL			
3) UNLabeled waste		Anythg B listed on chm			
4)					
5)					
6)					
7)					
8)					

Attach waste profile, analysis, MSDSs, or other information to indicate how the facility has complied with NR 615.06, Hazardous Waste Determination, for each waste stream.

+LDR Status - use the following codes:

- | | |
|--|---------------------------|
| 1. F001-F005 Solvents (NR 675.11) | 4. First 3rd (NR 675.14) |
| 2. F020-F023, F026-F028, Dioxins (NR 675.12) | 5. Second 3rd (NR 675.15) |
| 3. California list (NR 675.13) | 6. Third 3rd (NR 675.16) |

*Waste handling - Indicate if the waste is handled on-site or provide name of off-site facility.

V. WASTE ANALYSIS

- A. Is there a written waste analysis plan on file at the facility? NR 630.13(1)

Yes No NA

Comments _____

If the answer to 1. above, is yes, then answer Subsection B entirely. If the answer to 1. above, is no, then a waste analysis plan must be developed and kept at the facility. Go to section V.

- B. Has the waste analysis plan been revised to address F039 multi-source leachate?
- C. On what date was the waste analysis plan last revised?

Yes No NA

11/9/87

6/2/87

- D. 1. Do the analytical data contain all the information required to treat, store, or dispose of restricted wastes? NR 630.12(1) and NR 680.22(5)

Yes No NA

If yes, which of the following are sources of analytical data?
(More than one may apply):

- ☒ Generator provides data
☒ Facility performs analyses in on-site laboratory
☒ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? NR 630.12(4) and NR 680.22(5)

Yes No NA

If the analyses are conducted off site, identify lab:

2. Are wastes with treatment standards specified in analyzed using the toxicity characteristic leaching procedure (TCLP)? (BDAT = stabilization/immobilization technology) NR 675.07(2)(a)

Yes No NA

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing and note any problems. Attach test results. NR 630.31(1)(d) and NR 680.22(15)

3. Are wastes with treatment standards specified in NR 675.23 analyzed using total constituent analysis? (BDAT = destruction/removal technology) NR 675.07(2)(c)

Yes No NA

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. NR 630.31(1)(d) and NR 680.22(15)

University Handles Primary Dool Wastes
Sample For Total Chromium, FLASH, PCB's

4. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in liquid hazardous waste? NR 675.12(4)

Yes No NA

If yes, list the wastes for which PELT was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. NR 630.31(1)(d) and NR 680.22(15)

E. Does the written waste analysis plan contain:

1. The parameters for each waste tested and the reason for selecting the parameters? NR 630.13(1)(a) ☒ Yes No
2. The test methods used for each parameter? NR 630.13(1)(b) ☒ Yes No
3. The sampling method to be used to obtain a representative sample? See Appendix I, Chapter NR 605 for typical representative sampling methods. NR 630.13(1)(c) ☒ Yes No
4. The frequency with which the initial analysis will be reviewed or repeated to ensure that the analysis accurate and up to date? NR 630.13(1)(d) ☒ Yes No
5. If the waste is generated off-site, the waste analysis the generator(s) have agreed to supply? NR 630.13(1)(e) ☒ Yes No NA
6. If the waste is generated off-site, the procedures for inspecting and, if necessary, analyzing each shipment of waste received to ensure that it matches the identity of the waste on the manifests? NR 630.13(1)(g) ☒ Yes No NA

Comments FACILITY ONLY ACCEPTS WASTE GENERATED AT
UNIVERSITY TEACHING AND RESEARCH LABS. 20% OF THE
WASTE IS ANALYZED TO ENSURE THE IDENTITY OF THE WASTE MATCHES THE
MANIFEST.

F. Requirements for Certified or Registered Laboratory NR 630.13(2)

Does the facility use certified, registered or approved laboratory under ch. NR 149. ☒ Yes No

If yes, list the lab certification number.

Certification number 113 103 430

Note: If the waste analysis plan includes bacteriological and radiological samples, the samples shall be analyzed at a laboratory approved or certified by the Department of Health and Social Services under Chapters HSS 157 and HSS 165.

VI. MANIFEST SYSTEM, PACKAGING, LABELING, MARKING, AND SHIPPING

A. PROHIBITION ON STORAGE NR 675.30

1. Are containers and tanks marked with the date on which accumulation in the storage facility began? ☒ Yes No NA
NR 675.30(1)(b)
2. Have any wastes been in storage for greater than one year? NR 675.30(2) Yes ☒ No
3. If the answer to #2 is yes, can the owner/operator prove that the storage was necessary to facilitate proper recovery, treatment, or disposal? NR 675.30(3) Yes No ☒ NA

Note: Complete section B if the facility generates waste on site. Complete section C if the facility receives hazardous waste from off-site (even if the off-site facility is owned by the same company). Complete section D if the facility sends hazardous waste off-site.

B. WASTE GENERATED ON SITE

1. Are containers marked with the words "HAZARDOUS WASTE" or with other words that identify the contents of the container as hazardous waste? NR 615.09(2)(A) ☒ Yes No

C. WASTE RECEIVED FROM OFF-SITE

1. Are copies of manifests available for review? NR 630.31(2) ☒ Yes ☒ No
2. Are manifests properly completed? NR 630.30(2) ☒ Yes No
3. Does the facility receive a State of Wisconsin uniform manifest with all shipments of hazardous waste? NR 630.30(1) ☒ Yes No
4. Are records of past shipments to the facility (manifests) retained at the facility for at least 3 years and available for review? NR 630.30(4)(e) ☒ Yes No
5. Are copies of the completed manifest sent to the Department as required on the form? NR 630.30(4)(f) ☒ Yes No
6. Are container or portable tank labels consistent with the manifests? NR 630.30(2)(c) ☒ Yes No
7. Are discrepancy procedures followed properly if a discrepancy has occurred? NR 630.30(6) ☒ Yes No NA

Comments _____

D. WASTES SHIPPED OFF-SITE

1. Does the facility initiate a State of Wisconsin manifest, or a uniform hazardous waste manifest of another state as appropriate with all off-site shipments of hazardous waste? NR 630.30(7) ☒ Yes ☐ No

Comments _____

2. Are records of past shipments from the facility (manifests) retained at the facility for at least 3 years and available for review? NR 630.30(4)(e) ☒ Yes ☐ No
3. Does the facility ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility? ☒ Yes ☐ No

If no, go to 4.

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
D001	UNIV. OF WISC. Herick Drive & Hwy Locality.

Does the facility provide a notification to the treatment or storage facility with each waste shipment? NR 675.07(1)(1) ☒ Yes ☐ No

If the generator specifies alternative treatment standards for lab packs, is the certification required in NR 675.07(1)(h) and (i) included with the notification for each shipment? Yes ☐ No ☒ NA

4. Does the facility ship waste that meets treatment standards/prohibition levels to an off-site disposal facility? Yes ☐ No ☒

If no, go to 5.

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility

Does the facility provide a notification and a certification to the disposal facility with each waste shipment? NR 675.07(1)(b) ☒ Yes ☐ No ☐ NA

5. Are characteristic wastes which have been rendered nonhazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes

☒ No☒ NA

Waste Code Receiving Facility

_____	_____
_____	_____
_____	_____
_____	_____

6. Records Retention

Does the facility retain on site copies of all notifications, certification, and other relevant documents for a period of 5 years? NR 675.07(1)(e)

☒ Yes

No

7. Does the manifest specify a designated facility which is approved (operating license, interim license, variance, waiver, or licensing exemption) to take the waste? NR 630.30(7) and NR 615.08(3)

☒ Yes

No

8. Are procedures for exception reporting followed properly if an exception has occurred? NR 630.30(7) and NR 615.11(2)

Yes

No

☒ NA

9. Is waste packaged in accordance with DOT requirements? NR 630.30(7) and NR 615.09(1)

☒ Yes

No

10. If verifiable, are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials prior to transporting off-site? NR 630.30(7) and NR 615.09(2)

☒ Yes~~No~~

11. If required, are placards available to the transporter of the hazardous waste? NR 630.30(7) and NR 615.09(3)

☒ Yes

No

NA

Comments _____

VII. REPORTING

- A. Have annual reports covering facility activities during the previous calendar year been submitted to the Department by March 1 of the following year? NR 630.40(1)

☒ Yes

No

- B. Does the facility accept hazardous waste from off-site?

☒ Yes

No

If the answer to B. above, is yes, complete C. If no, go to Section VIII.

- C. Has the hazardous waste been accepted for treatment, storage or disposal from an off-site source without an accompanying manifest or shipping paper, as appropriate? NR 630.40(2)

Yes

☒ No

1. If the answer to C, above, is yes, is the hazardous waste excluded from the manifest requirement by s. NR 610.07? Yes No
2. If the answer to C, above, is no, has an unmanifested waste report been submitted to the Department within 15 days of receiving the waste? NR 630.40(2) Yes No N/A

Comments _____

VIII. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

- A. Does the facility have a written contingency plan addressing potential discharges of hazardous waste or hazardous waste constituents to air, land, groundwater or surface water? Yes No
 NR 630.22(1)(a)1.

Comments _____

If the answer to A above, is yes, then answer questions 1 through 7. If no, the facility must prepare a contingency plan. Go to section IX.

1. Is a copy of the Contingency Plan kept at the facility? Yes No
 NR 630.22(1)(b)1.)
2. Has a copy of the Contingency Plan been sent to all local police and fire departments, hospitals and emergency response teams who may be called to provide emergency services? Yes No
 NR 630.22(1)(b)2.
3. Does the plan identify an Emergency Coordinator, who is always on-site when the facility is in operation, and if appropriate, alternates with names, addresses, phone numbers, (office and home) provided? Yes No
 NR 630.22(1)(e)1.
4. Does the plan identify an Emergency Coordinator or alternate who will be present or on call when the facility is not in operation, and available to respond to an emergency by reaching the facility in a short period of time? Yes No
 NR 630.22(1)(d)
5. Are the person or persons identified in #4 and #5, above, familiar with all aspects of site activities and contingency plan implementation? Yes No
 NR 630.22(1)(d)
6. Do the person or persons identified in #4 and #5, above, have the authority to carry out all actions necessary to respond to fire, explosions or any unplanned discharge of hazardous waste to the air, land or surface water? Yes No
 NR 630.22(1)(d)

Comments _____

7. Does the plan contain the following:

- a. A description of the facility layout, types of waste handled and their associated hazards, places where facility personnel normally work, and entrances to and roads inside the facility? NR 630.22(1)(e)2. ☒ Yes ☐ No
- b. An evacuation plan for facility personnel, including signal(s) to be used to begin evacuation, evacuation routes and alternate routes? NR 630.22(1)(e)3. ☒ Yes ☐ No
- c. Procedures for emergency shutdown of facility operations, and the actions facility personnel must take to comply with NR 630.22(1)(a) and NR 630.22(2) in response to fires, explosions, or any unplanned discharge of hazardous waste or hazardous waste constituents to the air, land or surface water at the facility, including procedures to:
- 1) Activate internal facility alarms or communication systems to notify all personnel of an imminent or actual emergency situation, where applicable? NR 630.22(2)(a)1. ☒ Yes ☐ No
 - 2) Telephone the Division of Emergency Government (at (608) 266-3232) and comply with the requirements of s. 144.76, Stats., and ch. NR 158, Wis. Adm. Code? NR 630.22(2)(a)2. ☒ Yes ☐ No
 - 3) Immediately identify the character, source, amount and extent of any discharged hazardous materials? NR 630.22(2)(a)3. ☒ Yes ☐ No
 - 4) Assess possible hazards to human health or the environment that may result from discharge, fire, or explosion? NR 630.22(2)(a)4. ☒ Yes ☐ No
 - 5) Immediately notify appropriate authorities, if an assessment indicates that a discharge, fire, or explosion could threaten human health or the environment outside the facility, and that evacuation of local areas may be advisable? NR 630.22(2)(a)5. ☒ Yes ☐ No
 - 6) Take all reasonable measures necessary to ensure that, fires, explosions, and discharges do not occur, recur, or spread to other hazardous waste at the facility? NR 630.22(2)(a)6. ☒ Yes ☐ No
 - 7) Monitor for leaks, pressure buildup, gas generation, or ruptures, in valves, pipes or other equipment, where appropriate, if the facility stops operation in response to a fire, explosion, or discharge? NR 630.22(2)(a)7. ☒ Yes ☐ No

- 8) Provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a discharge, fire, or explosion at the facility, immediately after an emergency? NR 630.22(2)(a)8. ☒ Yes ☐ No
- 9) Ensure that, in the affected areas of the facility, no waste that may be incompatible with the discharged material is treated, stored, or disposed of until cleanup procedures are completed; and that all emergency equipment listed in the contingency plan is clean and fit for its intended use before operations are resumed? NR 630.22(2)(a)9. ☒ Yes ☐ No
- 10) Notify the Department before operations are resumed? NR 630.22(2)(b) ☒ Yes ☐ No
- d. Procedures to be used to notify local police and fire departments, hospitals and emergency response teams of a discharge of hazardous waste or a fire or explosion at the facility and a list of emergency telephone numbers? NR 630.22(1)(e)5. ☒ Yes ☐ No
- e. An up-to-date list of all emergency equipment at the facility, including the location, physical description and brief outline of the capabilities of each item? NR 630.22(1)(e)6. ☒ Yes ☐ No
8. Does the contingency plan require amending due to any of the following changes? NR 630.22(1)(c)
- a. Facility operating license, interim license, variance or waiver was amended? ☒ Yes ☐ No
- b. Contingency plan failed in an emergency? ☒ Yes ☐ No
- c. Facility changed design, construction, operation, maintenance or other circumstances which increased the potential for emergencies or changed the emergency response? ☒ Yes ☐ No
- d. List of emergency coordinators changed? ☒ Yes ☐ No
- e. List of emergency equipment changed? ☒ Yes ☐ No

Comments _____

IX. PERSONNEL TRAINING/RECORDS

- A. Does the facility have a program of classroom instruction or on-the-job training for personnel in hazardous waste management procedures? NR 630.16(1)

☒ Yes ☐ No

Comments _____

If the answer to A. is yes, then answer questions 1-4 below. If no, then a training program must be developed. Go to section X.

1. Does the program include training of personnel in Contingency Plan implementation? NR 630.16(1)(a) ☒ Yes ☐ No
2. Are the following items included in the program, if applicable? NR 630.16(1)(b)
 - a. Procedures for using, inspection, repairing, and replacing facility emergency and monitoring equipment? ☒ Yes ☐ No
 - b. Key parameters for automatic waste feed cut-off systems? Yes ☐ No ☒ NA
 - c. Communications or alarm systems? ☒ Yes ☐ No
 - d. Response to fires or explosions? ☒ Yes ☐ No
 - e. Response to groundwater contamination incidents (e.g., spills)? ☒ Yes ☐ No
 - f. Shutdown of operations (emergency procedures)? ☒ Yes ☐ No

Comments _____

3. Do new employees complete training within 6 months of assignment to the facility or to a new position? Personnel may not work in unsupervised positions until they have completed training. NR 630.16(2) ☒ Yes ☐ No
4. Do facility personnel take part in an annual review of the program mentioned in #1, above? NR 630.16(3) ☒ Yes ☐ No

Comments _____

- B. Are records of personnel training maintained at the facility? NR 630.16(4) ☒ Yes ☐ No

Comments _____

If the answer to B is yes then answer question 1. If no, then these records must be developed and maintained at the facility. Items listed in question 1, a-d, are items which must be included in personnel training records. Go to section X.

1. Are the following items included in personnel training records?:
NR 630.16(4)
- a. Job titles and the name of each employee performing the job? NR 630.16(4)(a) ☒ Yes ☐ No
 - b. Job descriptions? NR 630.16(4)(b) ☒ Yes ☐ No
 - c. Description of training required for each position? NR 630.16(4)(c) ☒ Yes ☐ No
 - d. Written documentation that training or job experience has been given and completed? NR 630.16(4)(d) ☒ Yes ☐ No

Note: Training records of current personnel must be kept until facility closure. Training records of former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records must accompany personnel transferred within the same company. NR 630.16(5)

Comments _____

X. SECURITY

- A. How is access and unauthorized entry controlled at the facility?
Indicate which of the following mechanisms are used by checking the appropriate boxes which best describe the facility's controls:
NR 630.14

Mechanism

- 1. ☐ Television Monitoring (24-hours per day required)
- 2. ☒ Surveillance by guards or facility personnel (24-hours per day required) *ALARM CALL CAMPUS POLICE*
- 3. ☐ Locked gate or gates
- 4. ☐ Fence or artificial barrier in good repair surrounding the entire facility
- 5. ☒ A building with an adequately locked entrance.
- 6. ☐ Controlled roadway access
- 7. ☒ Warning signs at the entrance and other appropriate locations

Comments CAMPUS POLICE ARE ON PATROL 24 Hrs/day.

Note: Minimum acceptable security combinations under NR 630.14 are:
1 and 7; 2 and 7; 3, 4 and 7; 5 and 7; 6 and 7.

B. If none of these acceptable security combinations are used, has the owner or operator successfully demonstrated to the Department that:

1. Physical contact with the waste, structures, or equipment within the active portion of the facility will not injure unknowing or unauthorized persons or livestock which may enter the active portion of a facility? NR 630.14(1)(b) Yes No ☒ NA
2. Disturbance of the waste or equipment by the unknowing or unauthorized entry of persons or livestock onto the active portion of a facility will not cause a violation of TSD standards? NR 630.14(1)(b) Yes No ☒ NA

Comments _____

XI. PREPAREDNESS AND PREVENTION

A. Does the facility have the following equipment, as applicable for the type of waste managed? (Note: the following equipment should be located so that it is accessible to the applicable storage or treatment areas.)

1. A device to ~~summon~~ emergency assistance, such as a telephone or a ~~2-way~~ radio? NR 630.21(2)(a) ☒ Yes No
2. Internal communications and alarm systems? NR 630.21(2)(b) ☒ Yes No
3. Portable fire extinguishers? NR 630.21(2)(c) ☒ Yes ~~No~~
4. Fire control equipment, including special extinguishing equipment and extinguishing agents: (include type and volume of extinguishing agents in "comments" section.) NR 630.21(2)(c) ☒ Yes No
5. Adequate spill control equipment? NR 630.21(2)(c) ☒ Yes No
6. Decontamination equipment (i.e. eyewash, shower, etc.) NR 630.21(2)(c) ☒ Yes No
- B. Is all of the emergency equipment mentioned in #1 tested and maintained as required to assure its proper operation in an emergency? NR 630.21(4) ☒ Yes No

Comments

14000 Fire Extinguisher system is tested
ON AN ANNUAL BASIS.

Down stairs by entrance

C. Specify how often the equipment mentioned in #1 is tested to assure proper operation:

Weekly + Monthly.

- D. Is immediate access to internal or external alarms from hazardous waste handling areas provided? NR 630.21(3)

☒ Yes ☐ No

Comments _____

- E. Have the following arrangements, as applicable, been made involving emergency organizations?

1. If more than one police and fire department may respond to an emergency, have agreements designating primary authority and support roles been made? NR 630.21(6)(b)

☒ Yes ☐ No NA

2. Have agreements with state emergency response teams, emergency response contractors and equipment suppliers been made to provide response? NR 630.21(6)(c)

☒ Yes ☐ No NA

3. Have arrangements to familiarize local hospitals with the properties of the hazardous waste handled and the types of injuries or illnesses which could result from an incident been made? NR 630.21(6)(d)

☒ Yes ☐ No

Note: An attempt must be made, as appropriate for the type of wastes and the potential need for services, to contact the emergency organizations mentioned in E(1-3), above, and make the arrangements outlined. If the organizations decline to participate, the refusal must be documented in the facility's operating record (see Section M regarding the operating record). NR 630.21(6)

- F. Is adequate aisle space provided throughout the hazardous waste facility to allow for unobstructed movement of personnel and all emergency equipment mentioned in #1, above? NR 630.21(5)

☒ Yes ☐ No

Comments _____

- G. If the facility handles ignitable or reactive waste, are these wastes separated from sources of ignition or reaction? NR 630.17(1)

☒ Yes ☐ No NA

- H. Are "No Smoking" signs posted in areas where there is a hazard from ignitable or reactive waste? NR 630.17(1)

☒ Yes ☐ No NA

Comments _____

XII. INSPECTIONS

- A. Does the facility have a written inspection schedule? NR 630.15(2)(a) and (b)

☒ Yes ☐ No

- B. Is a written inspection log kept and maintained at the facility? NR 630.15(4)

☒ Yes ☐ No

Comments _____

If the answers to A and B are yes, complete C. If the answers to A or B are no, then a written inspection schedule and/or log must be developed and kept at the facility. These records must be kept for at least 3 years from the date of inspection. Go to section XIII.

C. Does the inspection log contain inspection records of the following items, if applicable? NR 630.15(2)(a) and (c)

- | | | |
|--|--------------------------------------|-----------------------------|
| 1. Incidence or evidence of malfunctions or deterioration? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 2. Operator error? | <input checked="" type="radio"/> Yes | <input type="radio"/> No NA |
| 3. Incidence or evidence of discharges of hazardous waste? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 4. Monitoring equipment? | <input checked="" type="radio"/> Yes | <input type="radio"/> No NA |
| 5. Safety and emergency equipment? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 6. Security devices? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 7. Operating and structural equipment, such as dikes and sump pumps? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 8. Date and time of inspection? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 9. Frequency of Inspection? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 10. Name of inspector? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

Comments _____

D. Do the facility records document actions taken to correct problems detected during inspections? NR 630.15(3)

☒ Yes ☐ No

Comments _____

Note: The following questions are not a part of the inspection reporting requirements but are to be checked during the inspection.

E. Are there floor drains in the accumulation or storage areas?

Yes ☒ No

F. Do the floor drains connect to an underground spill accumulation or storage areas?

Yes ☐ No

☒ N/A

Comments _____

XIII. CONTAINER STANDARDS

- A. Are all the containers which are used to store or treat hazardous waste in good condition? NR 640.09 ☒ Yes No
- B. Are the containers made or lined with materials which are compatible with the waste in them? NR 640.10 ☒ Yes No
- C. Are containers stored closed, except when it is necessary to add or remove waste? NR 640.11(2) ☒ Yes No
- D. Are containers opened, handled and stored in such a way as to prevent leaks or ruptures? NR 640.11(3) ☒ Yes No
- E. Are containers inspected weekly for leaks and defects? NR 640.12(1) ☒ Yes No
- F. Are the inspections recorded into a facility inspection log or summary, which includes the date and the time of inspection, the name of the inspector, a notation of the observation made, and the date and nature of any repairs or other remedial actions? NR 630.15(4) ☒ Yes No

Note: These records shall be kept for at least 3 years from date of inspection.

Comments _____

- G. If the facility stores ignitable or reactive waste, are the containers at least 50 feet (15 meters) from the facility property line? NR 640.14 ☒ Yes No ^{NA} NA
- H. Are incompatible wastes stored in separate containers? NR 640.15(2)(b) ☒ Yes No NA
- I. Are empty containers washed prior to adding incompatible waste? NR 640.15(2)(a) ☒ Yes No NA
- J. Are containers of incompatible waste separated or protected from each other and other incompatible wastes in tanks, piles or surface impoundments by physical barriers such as a berm, dike, wall or sufficient distance? NR 640.15(1) ☒ Yes No NA

Comments _____

XIV. SATELLITE ACCUMULATION

If the generator accumulate waste in containers at or near the generation point, complete this section. If not, go to Section XV.

- A. Is the container in good condition? Yes No
NR 615.05(4)(c)1.
- B. Is the container always closed except when it is necessary to add or remove waste? Yes No
NR 615.05(4)(c)2.
- C. Is the container lined or compatible with the waste being accumulated? NR 615.05(4)(c)4. Yes No
- D. Is the container marked with words "Hazardous Waste" or with other words that correctly identify the contents of the container? NR 615.05(4)(c)5. Yes No
- E. Have 55 gallons or more of hazardous waste accumulated at or near the generation point? NR 615.05(4)(c)6. Yes No NA
- F. Has one quart or more of acutely hazardous waste listed in section NR 605.09(2)(a), Table II, or (3)(b), Table IV, accumulated at or near the generation point? NR 615.05(4)(c)6. Yes No NA

If the answer to either E or F is yes, then the facility must comply with applicable generator requirements of NR 615.05(4)(a) for this waste (90-day accumulation).

XV. LICENSING

- A. Does the facility have an interim license, operating license, variance or licensing exemption for all treatment and/or storage activities? Yes No
- B. Does the facility only accept hazardous waste that the operator is allowed to manage under the facility interim license, operating license, variance, or licensing exemption? Yes No
- C. Does the amount of wastes in storage or treatment comply with (not exceed) the maximum inventory allowed under the authorization(s) in 1 above? Yes No

Comments _____

- D. If the facility has a Department issued operating license, what is the license renewal date? 9/29/98 Yes No

Note: Facilities with a Department issued operating license must be checked for compliance with the license and plan of operation approval conditions. A copy of the specific conditions of the plan approval must be made prior to the inspection. The facility should be evaluated for compliance with these conditions. A copy of these conditions should be attached to this form, indicating which, if any, have been violated. If the plan approval dictates specific waste minimization activities that must be conducted, the inspector should document the status of these activities and any schedules that have been violated.

*Variance Request to Extend
closed
JMR.*

E. Does the facility have a RCRA Part B Permit? ☒ Yes ☐ No

F. Is the facility in compliance with its EPA Part B permit? ☒ Yes ☐ No

Note: If the EPA permit includes corrective action, check with Central Office Hydrogeologist on status.

G. When does the EPA Part B permit expire? 1998

Comments _____

XVI. CLOSURE PLAN

*A. Does the facility have a written closure plan? NR 685.05(2) ☒ Yes ☐ No

If the answer to A is yes, answer B below. If the answer is no, indicate below what measures are being taken to prepare the plan.

Comments _____

B. Are the following items included in the closure plan?

1. A description of how each hazardous waste management unit will be closed according to NR 685.05(1). NR 685.05(2)(a) ☒ Yes ☐ No

2. A description of how the final closure of the facility will be conducted according to NR 685.05(1). NR 685.05(2)(b) ☒ Yes ☐ No

3. Provide the anticipated time until final closure and any anticipated partial closures and the time for intervening closure activities for facilities regulated by NR 685.05(1)(c) or (d), and required to provide long-term care by NR 685.06. NR 685.05(2)(g) ☒ Yes ☐ No

4. The most recent closure cost estimates required by NR 685.07(2) and (3). The date closure cost estimates were prepared should also be included. NR 685.05(2)(h) ☒ Yes ☐ No

5. A description of how the facility will within 90 days after receiving the final volume of hazardous wastes, or 90 days after the closure plan approval, if that is later, remove or manage on site all hazardous wastes. Note: The facility may obtain Department approval for a longer period. NR 685.05(6) ☒ Yes ☐ No

6. A description of how the facility shall complete partial or final closure, according to the approved closure plan, within 180 days after receiving the final volume of wastes. Note: The facility may obtain department approval for a longer period. NR 685.05(7) ☒ Yes ☐ No

7. A description of how all contaminated soil, equipment and structures shall be properly disposed of or decontaminated during any partial or complete closure. For exceptions see NR 655.11(2)(b) and NR 685.05(8).
8. A description of how applicable closure requirements in sections NR 640.16 and NR 645.17 (Storage facility closure) and NR 660.16 (Treatment facility closure) will be met. NR 685.05(2)(j)

(Yes) No

(Yes) No

Comments _____

*Note: Written cost estimates and proof of financial responsibility for closure and, if applicable, long-term care (see the disposal facility specific inspection attachments) must be submitted to the Department as required by section NR 685.07, Wis. Adm. Code. Cost estimates and proof of financial responsibility must be based on the closure and long-term care plans. Cost estimates and the proof mechanism should be reviewed prior to the inspection to ensure the one on file with the Department is accurate and up to date.

XVII. FINANCIAL RESPONSIBILITY FOR CLOSURE AND LONG-TERM CARE

- A. Does the facility have proof of financial responsibility for closure costs? NR 685.07(1)(a)

(Yes) No

If yes:

What type of proof mechanism? TRUST FUND INFORMATION IS PROVIDED TO WDNR EACH YEAR.

What is its code citation? NR 685.07(5) (____)

What is the facility's "anniversary date" of the establishment of proof of financial responsibility for closure costs?

Is the amount of the proof mechanism adequate to cover the most recent closure cost estimate?

(Yes) No

Has the proof mechanism been updated by the facility's anniversary date to account for increases in the cost estimate based on adjustments for inflation?

(Yes) No

NR 685.07(3)(b)

Comments _____

XVIII. FINANCIAL RESPONSIBILITY FOR LIABILITY COVERAGE

- A. Does the facility have liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs? Applicable to all storage, treatment and disposal facilities. NR 685.08(1) Yes No

Comments UNIVERSITY HAS STATE FUNDED LIABILITY PROGRAM.

- B. Method used to demonstrate liability coverage?

1. Insurance _____ Financial Test _____ Guarantee _____
 Letter of Credit _____ Surety Bond _____ Trust Fund _____
 Other CONSENT AGREEMENT

2. Is the wording of the mechanism used to provide liability coverage identical to the wording required in NR 685.08(7) through NR 685.08(12)? Yes No

3. If the method used is liability insurance:

- a. What is the effective date of the insurance policy?

- b. Does the policy include a current: Yes No NA

_____ Hazardous Waste Facility Liability Endorsement,
or a
 _____ Hazardous Waste Facility Certificate of Liability
 Insurance, with wording identical to that
 specified in NR 685.08(7)?

4. If the method used is a financial test, are the data used in the financial test taken from the facility's financial statements for the latest completed fiscal year? NR 685.08(8) Yes No NA

5. If the method used is a guarantee, is the guarantor: NR 685.08(9) Yes No NA

_____ A direct or higher-tier parent corporation of the owner or operator,
 _____ A firm whose parent corporation is also the parent corporation of the owner or operator, or
 _____ A firm with a "substantial business relationship" with the owner or operator.

Comments STATE HAS OWN FUNDED LIABILITY ACCOUNT.

XIX. RECORDKEEPING

- A. Is an operating record maintained at the facility? NR 630.31(1) ☒ Yes No

If the answer to A is yes, answer section B. If no, then an operating record must be developed and maintained at the facility. The record must be maintained at the facility until closure (this retention period may be extended by the Department on a case-by-case basis).

- B. Does the operating record contain the following information:

1. A description of all waste handled, including its common name, hazardous waste number, physical form and quantity? NR 630.31(1)(a) ☒ Yes No
2. The method(s) and date(s) of each waste's treatment and/or storage or disposal? NR 630.31(1)(b) ☒ Yes No
3. The location and quantity of each hazardous waste within the facility? NR 630.31(1)(c) ☒ Yes No

Note: The information from questions 2 and 3 must be cross-referenced to specific manifest numbers for manifested shipments.

Comments _____

4. Records and results of waste analysis performed? NR 630.31(1)(d) ☒ Yes No
5. Records and results of inspections? NR 630.31(1)(f) ☒ Yes No
6. Summary reports and details of all incidents that implementation of the contingency plan including any necessary measures which have been or will be taken to prevent such incidents in the future? NR 630.31(1)(e) ☒ Yes No NA
7. All closure cost estimates and any changes that are made in these estimates? NR 630.31(1)(i) ☒ Yes No
8. Monitoring, analytical data and testing (other than waste analysis and trial tests -- see e., above) as required? NR 630.31(1)(h) ☒ Yes No NA

Comments _____

- C. Has the owner or operator signed a certification statement, at least annually, that a program is in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by the owner or operator to be economically practical? NR 630.31(1)(j)

Yes ☒ No

Note: The inspector should ask to see the facility waste minimization plan or other documentation of their program, and look for physical evidence that it is being implemented.

Comments _____

XX. MISCELLANEOUS INFORMATION

- A. Does the facility import or export hazardous waste from or to a foreign country? NR 630.10)

Yes ☒ No

Note: The Department must be notified at least four weeks in advance of the date a shipment of hazardous waste from a foreign source is expected to arrive at a facility. Notice of subsequent shipments from the same foreign source is not required after the first notice.

- B. Surface Water Run-on and Run-off:

1. Is run-on diverted from active portions of the site? NR 630.20(3)(a)

Yes ☒ No

2. Is run-off from active portions of the site collected and confined to a point source before discharge, and if necessary, is treatment provided? NR 630.20(3)(b)

Yes ☒ No

Note: The discharge and treatment must meet the applicable regulations under ch. 147, Stats. (WPDES). All nonpoint source discharges from the entire site should not cause or contribute to the violations of water quality standards specified in Chapters NR 102, NR 103, and NR 104, Wis. Adm. Code. (NR 630.20(6) and (7)).

- C. General Site Location (NR 630.18) - Is the facility located in:

1. A floodplain? NR 630.18(1)

Yes ☒ No

2. A wetland? NR 630.18(2)

Yes ☒ No

3. A critical habitat? NR 630.18(3)

Yes ☒ No

Comments _____

XXI. FACILITY STATUS EVALUATION

A. Facility Classification Based on District

Verification: STORAGE FACILITYSignature: Walt [Signature]Date: 5/8/98

This facility is also subject to regulation as a:

- ☒ exempt treatment facility
 (specify) NEUTRALIZED ACUTE WASTE WATER IN TANKS.
596 ACUTE
- ☐ transfer facility
- ☐ transporter
- ☐ generator - large quantity > 1,000 kg./mo.
- ☐ generator - acute hazardous > 1 kg./mo.
- ☐ generator - small quantity > 100 kg. but less than 1,000 kg./mo.
- ☐ very small quantity generator < 100 kg./mo.